

FRAMATOME ANP, Inc.

September 1, 2005

CFH:05:030

Attn: Document Control Desk
Director, Office of Nuclear Materials Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Amendment Request to Use of ICRP 68 for ALI and DAC Values

References: 1) SNM License 1168, Docket No. 70-1201
2) NRC Staff Requirements Memorandum, To Request Commission Approval to Grant Exemptions from Portions of 10 CFR Part 20, dated April 21, 1999 (SECY-99-077)

Enclosure: Change pages to Chapter 1 of license application

Dear Mr. Gleaves:

Framatome-ANP, Inc. hereby requests an amendment to Chapter 1 of its license application to authorize use of annual limits of intake (ALIs) and derived air concentrations (DACs) based upon dose coefficients published in the International Committee on Radiological Protection (ICRP) publication number 68, entitled *Dose Coefficients for Intake of Radionuclides by Workers* (ICRP 68, Volume 24, No. 4, 1994).

The proposed exemption request to 10 CFR 20, Appendix B as contained herein is consistent with directives described in the Reference 2. In addition, this proposed licensing action is administrative and procedural in nature and commensurate with criteria allowing a categorical exclusion, as specified in 10 CFR 51.22 (c)(11).

Framatome ANP considers this request to be administrative in nature in that:

- There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.
- There is no significant increase in individual or cumulative occupational radiation exposure.
- There is no construction activity or impact involved with the request.
- There is no significant increase in the potential for or consequences from radiological accidents.

Nmss01

Should this request be accepted, the adoption of the revised methodology will be applied to 2005 inhalation dose.

Enclosed, to accomplish this change are six copies of the change pages for the revised license application, Chapter 1.

Should you have any questions regarding this submittal, please call me at (434)-832-5276.

Sincerely,

A handwritten signature in black ink, appearing to read "Charlie Holman", with a stylized flourish at the end.

Charlie F. Holman
Manager, Environmental,
Health, Safety and Licensing.
Framatome ANP, Inc.

Enclosure I

Change Pages

Page	Section	Description
1-7 – 1-8	1.5 (f)	Added paragraph describing authorization to use ICRP 68 dose coefficients

c) Free-Release Limits

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d) Possession at Reactor Sites

Framatome ANP, Inc. may possess unirradiated fuel assemblies at nuclear reactor facilities anywhere within the United States, for the purpose of loading them into shipping packages, and delivery to an authorized carrier for transport in accordance with the regulations. Operations incident to such loading shall be subject to the control of a Framatome ANP representative, approved by the manager of the regulatory affairs function, who shall assure that the completed transport package complies with all requirements of the regulations.

For such operations, Framatome ANP shall be exempted from conditions of Title 10, Code of Federal Regulations, Part 70.24; 'CRITICALITY ACCIDENT REQUIREMENTS' provided:

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a) Site Geography

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The facility is located on an approximately 70 acre site in Campbell County approximately 4 miles from the Lynchburg city limits. The site is adjacent to the BWX Technologies NNFD and Nuclear Technology Center plant sites. The physical layout of the site is as shown in Figure 1-1. The relationship between the facility and the BWX Technologies NNFD and Nuclear Technology Center plant sites is illustrated in Figure 1-2.

The site is adjacent to state route 726. There are no interstate highways nearby.

The nearest body of water is the James River. The facility site lies on a river bend bounded on three sides by the James River and on the southeastern side by Mt. Athos.

b) Demographics

Census data from the U.S. Census Bureau for the 2000 census indicates that the population for Campbell County was 51,078. Population for the city of Lynchburg was 65,269.

Because of the terrain, most of the population within a 5 mile radius of the facility resides over 3 miles from the site. There are no significant clusters of population within a 2 mile radius of the facility. The closest inhabitants occupy residences, which are located about one-half mile to the ENE.

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